



5. On January 4, 2018, pursuant to 28 U.S.C. § 1715 (a) & (b), Eversheds Sutherland (US) LLP staff, acting under my direct and supervision, served the CAFA Notice, which consisted of a cover letter and certain accompanying documents. The Notice was served upon the U.S. Attorney General and the appropriate government officials for all fifty states and in American Samoa, Guam, the Northern Mariana Islands, Puerto Rico, the Virgin Islands, Micronesia, Palau, and the Marshall Islands.

6. Attached as Exhibit A is a true and correct copy of the letter that was mailed as described in paragraph 5.

7. Attached as Exhibit B is the list of the names and addresses of the government officials upon whom the CAFA Notice was served.

8. I have not received any objections or concerns regarding the CAFA notice nor the Settlement itself.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 29<sup>th</sup> day of January, 2018.



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Lewis S. Wiener

# **EXHIBIT A**

EVERSHEDS  
SUTHERLAND

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January 4, 2018

**Via Certified Mail**

**Re: CAFA Notice of Proposed Class Action Settlement**

Dear Sir or Madam:

Eversheds Sutherland (US) LLP represents Fora Financial, LLC and Fora Financial Holdings, LLC (collectively, "Defendants") in a putative class action lawsuit alleging violations of the Telephone Consumer Protection Act, 47 U.S.C. §227 and the Illinois Consumer Fraud Act, 815 ILCS 505/2 entitled *Scott Dolemba vs. Fora Financial, LLC and Fora Financial Holdings, LLC*, Case No. 1:16-cv-10651. The lawsuit is pending before the Honorable Andrea R. Wood in the United States District Court for the Northern District of Illinois. This letter is to advise you that the Court preliminarily approved a class action settlement on December 14, 2017.

**Case Name:** *Scott Dolemba vs. Fora Financial, LLC and Fora Financial Holdings, LLC*

**Case Number:** Case No. 1:16-cv-10651

**Jurisdiction:** United States District Court for the Northern District of Illinois (Eastern Division)

**Date Proposed Settlement**

**Filed with the Court:** December 12, 2017

Defendants deny any wrongdoing or liability whatsoever, but have decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the following documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** A copy of the *Class Action Complaint* is included on the enclosed CD-ROM.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The Final Approval Hearing is currently scheduled for May 15, 2018. Included on the enclosed CD-ROM is the Court's *Order Granting Plaintiff's Motion for Preliminary Approval of Settlement*.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** A copy of the *Class Notice with Claim Form* to be provided to the class is included on the enclosed CD-ROM.
4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** A copy of the *Class Action Settlement Agreement* is included on the enclosed CD-ROM.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** As of the date of this letter no other settlement or agreement has been entered into by the parties to this Action.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of the date of this letter, nor have any Notices of Dismissal been granted at this time.

Eversheds Sutherland (US) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. For a full description of the structure and a list of offices, please visit [www.eversheds-sutherland.com](http://www.eversheds-sutherland.com).

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7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** Pursuant to 28 U.S.C. § 1715(b)(7)(A), at this time it is not feasible to provide a list of class members who reside in each state, because the class member data does not include for all class members the name, address, or state of residence for each person to whom a call was placed allegedly in violation of the TCPA. Rather, the available data reflects principally the telephone number (and area code) to which a call may have been successfully placed. There are approximately 47,385 class members. Pursuant to 28 U.S.C. § 1715(b)(7)(B), the following is an estimate of the approximate percent of class members residing in each state and the proportionate share of the claims such class members have to the entire settlement: Florida (14%), California (13%), Texas (12%), New York (6%), Georgia (3%), North Carolina (3%), Ohio (3%), Illinois (3%), Maryland (2%), Michigan (2%), Massachusetts (2%), New Jersey (2%), Pennsylvania (2%). We estimate that less than 2% of the class members reside in any other single state or jurisdiction. Because these class members are spread across many states and jurisdictions, this notice is being sent to the appropriate officials in all 50 states and in the District of Columbia, American Samoa, Guam, the Northern Mariana Islands, Puerto Rico, the Virgin Islands, Micronesia, Palau, and the Marshall Islands.

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** A copy of the Court's *Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement* is included on the enclosed CD-ROM.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact me immediately at (202) 383-0140 or by e-mail at [lewiswiener@eversheds-sutherland.com](mailto:lewiswiener@eversheds-sutherland.com) so that I can address any concerns or questions you may have.

Very truly yours,



**LEWIS S. WIENER**  
Eversheds Sutherland (US) LLP

Enclosure: CD-ROM

# **EXHIBIT B**

Last	First	Company	Address 1	Address 2	City	State	Zip
1 Richards	Craig W.	Office of the Alaska Attorney General	P.O. Box 110300		Juneau	AK	99811-0300
2 Strange	Luther	Office of the Alabama Attorney General	501 Washington Avenue	PO Box 300152	Montgomery	AL	36130-0152
3 Rutledge	Leslie	Arkansas Attorney General Office	323 Center Street, Suite 200		Little Rock	AR	72201-2610
4 Brnovich	Mark	Office of the Arizona Attorney General	1275 W. Washington Street		Phoenix	AZ	85007
5 Becerra	Xavier	Office of the Attorney General	Consumer Law Section	455 Golden Gate Ave., Suite 11000	San Francisco	CA	94102
6 Coffman	Cynthia	Office of the Colorado Attorney General	Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor	Denver	CO	80203
7 Jepsen	George	State of Connecticut Attorney General's Office	55 Elm Street		Hartford	CT	06106
8 Racine	Karl A.	District of Columbia Attorney General	441 4th Street, NW, Suite 1100S		Washington	DC	20001
9 Jefferson	Sessions	Attorney General of the United States	United States Department of Justice		Washington	DC	20530-0001
10 Denn	Matt	Delaware Attorney General	Carvel State Office Building	820 N. French Street	Wilmington	DE	19801
11 Bondi	Pam	Office of the Attorney General of Florida	The Capitol, PL-01		Tallahassee	FL	32399-1050
12 Olens	Sam	Office of the Georgia Attorney General	40 Capitol Square, SW		Atlanta	GA	30334-1300
13 Chin	Douglas S.	Office of the Hawaii Attorney General	425 Queen Street		Honolulu	HI	96813
14 Miller	Tom	Iowa Attorney General	Hoover State Office Building	1305 E. Walnut Street	Des Moines	IA	50319
15 Wasden	Lawrence	State of Idaho Attorney General's Office	Statehouse	700 W. Jefferson St	Boise	ID	83720-0010
16 Madigan	Lisa	Illinois Attorney General	James R. Thompson Center	100 W. Randolph Street	Chicago	IL	60601
17 Zoeller	Greg	Indiana Attorney General's Office	Indiana Government Center South	302 West Washington Street, 5th Floor	Indianapolis	IN	46204
18 Schmidt	Derek	Kansas Attorney General	120 S.W. 10th Ave., 2nd Floor		Topeka	KS	66612-1597
19 Conway	Jack	Office of the Kentucky Attorney General	700 Capitol Ave	Capitol Building, Suite 118	Frankfort	KY	40601
20 Caldwell	James D.	Office of the Louisiana Attorney General	P.O. Box 94095		Baton Rouge	LA	70804-4095
21 Healey	Maura	Office of the Attorney General of Massachusetts	1 Ashburton Place		Boston	MA	02108-1518
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23 Mills	Janet	Office of the Maine Attorney General	State House Station 6		Augusta	ME	04333
24 Schuette	Bill	Office of the Michigan Attorney General	P.O. Box 30212	525 W. Ottawa Street	Lansing	MI	48909-0212
25 Lori Swanson	Attorney General	Attention: CAFA Coordinator	1400 Bremer Tower	445 Minnesota Street	St. Paul	MN	55101-2131
26 Koster	Chris	Missouri Attorney General's Office	Supreme Court Building	207 W. High Street	Jefferson City	MO	65101
27 Hood	Jim	Mississippi Attorney General's Office	Department of Justice	P.O. Box 220	Jackson	MS	39205
28 Fox	Tim	Office of the Montana Attorney General	Justice Bldg.	215 N. Sanders Street	Helena	MT	59620-1401
29 Cooper	Roy	Office of the North Carolina Attorney General	Department of Justice	P.O. Box 629	Raleigh	NC	27602-0629
30 Stenshjem	Wayne	North Dakota Office of the Attorney General	State Capitol	600 E. Boulevard Avenue	Bismarck	ND	58505-0040
31 Peterson	Doug	Office of the Nebraska Attorney General	State Capitol	P.O. Box 98920	Lincoln	NE	68509-8920
32 Foster	Joseph A.	New Hampshire Attorney General	State House Annex	33 Capitol Street	Concord	NH	03301-6397
33 Porrino	Christopher	Office of the New Jersey Attorney General	Richard J. Hughes Justice Complex	25 Market Street, P.O. Box 080	Trenton	NJ	08625
34 Balderas	Hector	Office of the New Mexico Attorney General	P.O. Drawer 1508		Santa Fe	NM	87504-1508
35 Laxalt	Adam Paul	Nevada Attorney General	Old Supreme Ct. Bldg.	100 North Carson Street	Carson City	NV	89701
36 Schneiderman	Eric	Office of the New York Attorney General	Department of Law	The Capitol, 2nd Floor	Albany	NY	12224
37 DeWine	Mike	Ohio Attorney General	State Office Tower	30 E. Broad Street	Columbus	OH	43266-0410
38 Pruitt	Scott	Oklahoma Office of the Attorney General	313 NE 21st Street		Oklahoma City	OK	73105
39 Rosenblum	Ellen F.	Office of the Oregon Attorney General	Justice Building	1162 Court Street, NE	Salem	OR	97301
40 Shapiro	Josh	Pennsylvania Office of the Attorney General	1600 Strawberry Square		Harrisburg	PA	17120
41 Kimartin	Peter	Rhode Island Office of the Attorney General	150 South Main Street		Providence	RI	02903
42 Wilson	Alan	South Carolina Attorney General	Rembert C. Dennis Office Bldg.	P.O. Box 11549	Columbia	SC	29211-1549
43 Jackley	Marty J.	South Dakota Office of the Attorney General	1302 East Highway 14, Suite 1		Pierre	SD	57501-8501
44 Slatery, III	Herbert H.	Tennessee Attorney General and Reporter	425 5th Avenue North		Nashville	TN	37243
45 Paxton	Ken	Attorney General of Texas	Capitol Station	P.O. Box 12548	Austin	TX	78711-2548
46 Reyes	Sean	Utah Office of the Attorney General	State Capitol, Room 236	350 N State St	Salt Lake City	UT	84114-0810
47 Herring	Mark	Office of the Virginia Attorney General	900 East Main Street		Richmond	VA	23219
48 Sorrell	William H.	Office of the Attorney General of Vermont	109 State Street		Montpelier	VT	05609-1001
49 Ferguson	Bob	Washington State Office of the Attorney General	1125 Washington St SE	P.O. Box 40100	Olympia	WA	98504-0100
50 Schimel	Brad	Office of the Wisconsin Attorney General	Dept of Justice, State Capitol, RM 114	East P.O. Box 7857	Madison	WI	53707-7857

51	Morrisey	Patrick	West Virginia Attorney General	State Capitol	1900 Kanawha Blvd E	Charleston	WV	25305
52	Michael	Peter K.	Office of the Wyoming Attorney General	State Capitol Bldg.	200 W 24th St	Cheyenne	WY	82002
53	Ale	Talauega Eleasalo V.	American Samoa Attorney General	Exec. Ofc. Bldg, Utulei	Territory of American Samoa	Pago Pago	AS	96799
54	Barrett-Anderson	Elizabeth	Attorney General Office	590 S. Marine Corps Drive	ITC Bldg, Suite 706	Tamuning	Guam	96913
55	Manibusan	Edward	Northern Mariana Islands Attorney General	Administration Building	PO Box 10007	Saipan	MP	96950-8907
56	Miranda-Rodriguez	Cesar R.	Puerto Rico Attorney General	P.O. Box 902192	San Juan	San Juan	PR	00902
57	Walker	Claude E.	Department of Justice	Virgin Islands Attorney General	34-38 Kronprindsens Gade, GERS Bldg, 2nd Floor	St. Thomas	VI	00802
58	Skilling	April Dawn	Office of the Secretary	Department of Justice for the Federated States of Micronesia	P.O. Box PS 105	Palikir, Pohnpei	FM	96941
59			Office of the Attorney General	P.O. Box 1365		Koror	PW	96940
60			Office of the Attorney General	P.O. Box 890		Majuro	MH	96960